

United States Bankruptcy Court
Eastern District of Virginia
Richmond Division

In Re: Michael Robert Dickinson
Debtor
3717 Patterson Avenue, Richmond, VA 23221

Case #18-34024-KRH
Chapter 13
Social Security #: xxx-xx-4844

OBJECTION TO CLAIM NUMBERS 2 (2-1 and 2-2)

The Debtor Michael Robert Dickinson objects to Claim No. 2 (2-1 and 2-2) in this bankruptcy case on the following grounds:

1. Samuel J.T. Moore, III filed a proof of claim on August 23, 2018, which was docketed as claim number 2 (2-1).
2. Samuel J.T. Moore, III filed an amended proof of claim on September 7, 2018, which was docketed as claim number 2 (2-2), replacing claim number 2-1.
3. Samuel J.T. Moore, III alleges in its claim that it has a judgment order in the amount of 225,929.14 secured against real estate, motor vehicle, and other, described as cash, assets.
4. Samuel J.T. Moore, III alleges in its claim that it has the right of setoff against debtor's real property located at 2717 Patterson Avenue, Richmond, VA 23221.
5. Samuel J.T. Moore, III fails to submit proof of his secured interest against the real estate, motor vehicle, and cash or assets.
6. Samuel J.T. Moore, III fails to submit proof of his right to setoff.

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Stuart Law Firm, LLC
2222 Monument Avenue
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(804) 221-2162
Counsel for Debtor

Wherefore, the Debtor respectfully requests that the court order that Claim #2 (2-1 and 2-2) be disallowed and rejected as a secured claim.

Michael Robert Dickinson

Date: October 31, 2018

By: /s/ Sharon C. Stuart
Sharon C. Stuart, VSB # 45026
Stuart Law Firm, LLC
2222 Monument Ave, Richmond, VA 23220
(804) 221-2162
Counsel for the Debtor

CERTIFICATE OF SERVICE

I certify that on October 31, 2018, a copy of the foregoing has been mailed to the following:

Samuel J.T. Moore, III
1011 W. Grace Street
Richmond, VA 23220
Via First Class Mail

Carl M. Bates
Chapter 13 Trustee
PO Box 1819
Richmond, VA 23218
Via First Class Mail

Michael Dickinson
3717 Patterson Avenue
Richmond, VA 23221
Via First Class Mail

/s/ Sharon C. Stuart

Sharon C. Stuart
Counsel for Debtor